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Safety, Division of Nevada Highway Patrol, and
Luke Stang*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSH MYERS, as Parent and Legal
Guardian on behalf of EKS, a minor child,

Plaintiff,

vs.

NYE COUNTY, a County of State of
Nevada; DEPARTMENT OF PUBLIC
SAFETY, DIVISION OF NEVADA
HIGHWAY PATROL, a political
subdivision of the STATE OF NEVADA;
NYE COUNTY DEPUTY BREANNA
NELSON; NYE COUNTY LIEUTENANT
ALAN W. SCHRIMP; NYE COUNTY
DETECTIVE BROOKE GENTRY; NYE
COUNTY DEPUTY MICHAEL MOKESKI;
NYE COUNTY TRAINEE ISAAC
CHAMPLIN; NYE COUNTY DETECTIVE
DANIEL FISCHER; NEVADA HIGHWAY
PATROL TROOPER LUKE STANG; DOE
OFFICERS, AGENTS, or the like I through
X, Inclusive; and ROE CORPORATIONS I
through X, inclusive, ROE AGENCIES OR
POLITICAL SUBDIVISIONS I-X

Defendants.

Case No.: 2:23-cv-00478-CDS-EJY

**JOINT STIPULATION TO EXTEND
RESPONSE DEADLINES**

(Third Request)

Plaintiff Josh Myers, as Parent and Legal Guardian on behalf of EKS, a minor child,
by and through counsel, Boyd B. Moss III, Esq., and Defendants Daniel Fischer, Isaac
Champlin, Brooke Gentry, Alan W. Shrimpf, Breanna Nelson, Michael Mokeski, Luke

Stang, Department of Public Safety, Division of Nevada Highway Patrol, and Nye County, by and through their respective counsels, have conferred and hereby stipulate to extend Defendants' deadline to respond to Plaintiff's Complaint for an additional sixty (60) days.

The parties submit there is good cause for the extension. Plaintiff seeks consolidation of this matter with the related action *Roberts v. Nye County, et al.*, Case No. 2:22-cv-00398-RFB-EJY. To address various issues related to the possible consolidation of this matter, including how consolidation may impact the status of the pending defense motions in the *Roberts* case, the parties conferred by phone and later submitted a stipulation to set a pretrial conference on June 26, 2023. However, as of the date of this filing the *Roberts* court has not ruled on either the pretrial conference request or the pending defense motions. Accordingly, the parties hereby agree to extend the deadline for Defendants to respond to Plaintiff's Complaint for an additional sixty (60) days, with responsive pleadings due no later than December 22, 2023.

IT IS SO STIPULATED.

DATED this 20th day of October 2023. DATED this 20th day of October 2023.

/s/Boyd B. Moss

Boyd B. Moss III, Esq.

Marcus A. Berg, Esq.

John C. Funk, Esq.

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Attorneys for Defendants Breanna Nelson, Alan W. Schrimpf, Brooke Gentry, Michael Mokeski, Isaac Champlin, and Daniel Fischer

DATED this 20th day of October 2023. DATED this 20th day of October 2023.

/s/Stephanie Bedker

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Public Safety, Division of Nevada
Highway Patrol, and Luke Stang*

ORDER

IT IS SO ORDERED. The deadline for Defendants Daniel Fischer, Isaac Champlin, Brooke Gentry, Alan W. Shrimpf, Breanna Nelson, Luke Stang, Department of Public Safety, Division of Nevada Highway Patrol, Michael Mokeski, and Nye County to respond to Plaintiff's Complaint is extended for an additional sixty (60) days up to and including December 22, 2023.

DATED: October 20, 2023


UNITED STATES MAGISTRATE JUDGE